

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA §
§
v. § No. 4:24-CR-70
§ Judge Mazzant/ Judge Davis
MICHAEL AXEL FLORES §
RAMIREZ (1) §

ELEMENTS OF THE OFFENSE

You are charged in Count One of the First Superseding Indictment with violations of 18 U.S.C. §§ 933(a)(2), (3) (Trafficking in Firearms; Attempt). The essential elements which must be proved beyond a reasonable doubt in order to establish a violation of that section are:

1. The defendant knowingly conspired to receive or attempt to receive a firearm that had moved from one state to another or from a foreign nation to the United States; and
2. While knowing or having reasonable cause to believe that such receipt would constitute a Federal or State felony.

Respectfully submitted,

ABE MCGLOTHIN, JR.
Acting United States Attorney
Eastern District of Texas

/s/ Matthew T. Johnson

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CERTIFICATE OF SERVICE

I certify that I filed a true and correct copy of this document through the district court's Case Management/Electronic Case File ("CM/ECF") system on May 5, 2025. All case participants should have received notice of the filing through the CM/ECF system.

/s/ Matthew T. Johnson
MATTHEW T. JOHNSON